

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KAREEM RAY SENISES,	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
KAREEM RAY SENISES,	:	
Respondent	:	CASE NO. 1-23-bk-00736-HWV

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 27th day of November, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. The Trustee avers that the Debtor's Plan is not feasible based upon the following:
- a. Plan is ambiguous regarding the base amount. More specifically, the total of the tier from 12/2025 to 04/2028 should be \$81,478.98, not \$76,856.38. Also, the total base amount should be \$114,636.06, not \$110,013.46.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 27th day of November, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Leonard Zagurskie, Jr., Esquire
110 West Main Avenue
1st Floor
Myerstown, PA 17067

/s/Derek M. Stroupbauer
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee